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Rowland Marcus Andrade

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Case No. 20-cr-00249-RS

Plaintiff,

**DEFENDANT'S MOTION FOR
ADMINISTRATIVE RELIEF TO
ENLARGE TIME**

ROWLAND MARCUS ANDRADE,

DEFENDANT'S MOTION FOR ADMINISTRATIVE RELIEF TO ENLARGE TIME

Defendant Rowland Marcus Andrade, by and through undersigned counsel, respectfully moves for administrative relief under Civil Local Rule 7-11 (incorporated in criminal proceedings by Crim. L.R. 2-1) to enlarge the time for two imminent filings: (1) Defendant's reply in support of his Motion for Bond Pending Appeal, and (2) Defendant's opposition to the Government's Application for Order Issuing Forfeiture Money Judgment.

I. BACKGROUND

1. On September 16, 2025, Defendant filed his Motion for Bond Pending Appeal. (Dkt. 742).

DEFENDANT'S MOTION FOR ADMINISTRATIVE RELIEF TO ENLARGE TIME

2. The Government filed its opposition on September 23, 2025 (Dkt. 761). Under Crim. L.R. 47-2(d), Defendant's reply is due September 29, 2025 (four days after the opposition deadline, adjusted for the weekend).

3. On September 24, 2025, the Government filed its Application for Order Issuing Forfeiture Money Judgment (Dkt. 762). Under Crim. L.R. 47-2(d), Defendant's opposition is due October 1, 2025.

II. GOOD CAUSE

1. Undersigned counsel only recently substituted into this matter and requires a short extension to review the record, trial proceedings, and recent filings in order to provide the Court with focused and useful briefing.

2. Undersigned counsel sought the Government's agreement to a short extension; the Government declined to stipulate. *See* Pierce Decl. ¶ 5 & Ex. A.

3. This request is made in good faith, not for purposes of delay, and a modest, consolidated extension will not prejudice the Government.

III. REQUESTED RELIEF

Defendant respectfully requests that the Court enlarge both deadlines to October 3, 2025, as follows:

- Reply in support of Motion for Bond Pending Appeal: due October 3, 2025;
 - Opposition to Government's Application for Forfeiture Money Judgment: due October 3, 2025.

Dated: September 25, 2025

Respectfully submitted,

DEFENDANT'S MOTION FOR ADMINISTRATIVE RELIEF TO ENLARGE TIME

John M. Pierce

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Attorney for Defendant Rowland Marcus Andrade

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 25, 2025, a true and accurate copy of the above and foregoing was filed on the above date with the Clerk of Court, using the Court's CM/ECF system, which will automatically provide notice and a copy of said filing to all parties or attorneys of record registered therein.

John M. Pierce

John M. Pierce, Esq.

PLEADING TITLE - 1